

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Nicholas J. Cremona

Heather J. McDonald

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

POTAMKIN FAMILY FOUNDATION, INC.,

Defendant.

Adv. Pro. No. 10-05069 (SMB)

STIPULATION FOR ENTRY OF FINAL JUDGMENT ON CONSENT

IT IS HEREBY STIPULATED AND AGREED by and between plaintiff Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff (the "Trustee") and Potamkin Family Foundation I, Inc. ("Defendant" together with Trustee the "Parties), as follows:

1. That Defendant, represented in this action by counsel, has read and understands the contents of this Stipulation for Entry of Final Judgment on Consent (this "Stipulation").

2. That this Stipulation shall be filed immediately upon its execution.

3. That on or about July 26, 2017, the Parties entered into a Settlement Agreement and Release (the "Settlement Agreement") and pursuant to the terms of the Settlement Agreement, Trustee is entitled to immediate entry of Final Judgment, a copy of which is attached hereto as Exhibit 1, entered against Defendant, in the amount of Eight Hundred and Ninety-Six Thousand, Five Hundred United States Dollars (\$896,500.00).

4. That Defendant confirms the amount set forth in Paragraph 3, above.

5. That Defendant consents to the jurisdiction of the Bankruptcy Court for all purposes, including entry of Final Judgment.

6. That each and all of the allegations, claims and contentions of Trustee alleged in the Complaint on file herein are not disputed by Defendant.

7. The Avoidable Transfers alleged in the Complaint are avoidable and avoided under section 548 of the Bankruptcy Code, SIPA and under applicable state law and are recoverable by the Trustee under sections 550 and/or 551 of the Bankruptcy Code, SIPA and under applicable state law.

8. That judgment shall be final for all purposes upon entry of the Final Judgment and Defendant waives any right to appeal therefrom.

9. That the Final Judgment shall not bear interest.

10. That Defendant hereby expressly waives notice of entry of judgment and notice of and right to any hearing regarding entry of judgment.

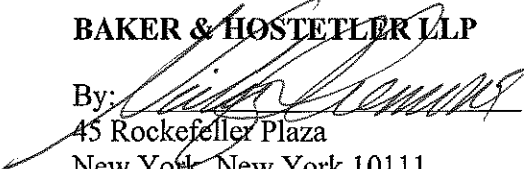
11. This Stipulation may be signed in counterparts, all of which when taken together shall constitute the agreement of the Parties hereto. A photocopy, facsimile or email signature to this Stipulation shall be deemed as an original signature for any and all purposes.

12. This Stipulation is defined and limited as set forth herein and by the terms of the Settlement Agreement.

13. That the Bankruptcy Court shall retain jurisdiction over the Parties to enforce this Stipulation until there is full performance of the terms hereof.

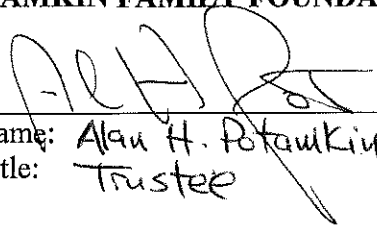
Dated: August 14, 2017

BAKER & HOSTETLER LLP


By: 
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Heather J. McDonald
Email: hmcDonald@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

**POTAMKIN FAMILY FOUNDATION I,
INC.**

By: 
Name: Alan H. Potamkin
Title: Trustee

MILBERG LLP

By: 
One Pennsylvania Plaza
50th Floor
New York, New York 10119

Telephone: 212.594.5300
Facsimile: 212.868.1229
Matthew A. Kupillas
Email: mkupillas@milberg.com

Attorneys for Defendant